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June 23, 2005

William M. Welch II, Esq.
Assistant United States Attorney
Federal Building and Courthouse
1550 Main Street, Room 310
Springfield, MA 01103


Re: United States v. Maria Serrazina, United States District
Court, Criminal Action No. 04-30033-MAP

Dear Mr. Welch:

In reviewing my file in preparation for the status conference on June 27, 2005, I found that the letter request for discovery, which I had prepared in early June, had inadvertently not been sent to you but instead remained in the file. This was the letter request that David Hoose asked to join in his letter request to you on behalf of Merylena Asselin, dated June 14, 2005. (At his request, I had forwarded a copy of my letter request to him.)

I apologize for the inadvertent non-filing of this letter request for discovery. I would appreciate it if you could respond appropriately. Given the continuance of the status conference to August 2005, I do not believe that this late filing will prejudice you in any way. If you would like me to address the Court with regard to this matter, please advise me.

Very truly yours,



Thomas Lesser

TL/kt

cc: Office of the Clerk, U.S. District Court
David Hoose, Esq.

Serrazina\Ltr. Welch re Ltr. Request
6/23/05



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June 6, 2005

William M. Welch II, Esq.
Assistant United States Attorney
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1550 Main Street, Room 310
Springfield, MA 01103

Re: United States v. Maria Serrazina, United States District
Court, Criminal Action No. 04-30033-MAP

Discovery Letter

Dear Mr. Welch:

Pursuant to Local Rule 116.3, Fed. R. Crim. P. 12(d)(2), 16(a), and 26.2, Brady v. Maryland, 373 U.S. 83 (1963), and all other applicable rules and statutes, the defendant Maria Serrazina requests the government provide her the following discovery in the above-captioned case. In making this request, the defendant is seeking documents and information in the possession of not only the Department of Justice, but also in the possession of all government agencies involved in the investigation and prosecution of defendant.

1. Please identify all documents or things the government intends to use in its case-in-chief at trial. In addition, if the government has already prepared any preliminary list(s) and/or any indice(s) of documents, please provide such list(s) or indice(s).
2. Please confirm that the government does not intend to use any expert testimony at trial. Alternatively, if the government does intend to call expert witnesses at trial, please provide the disclosures required by Fed. R. Crim. P. 16 and Local Rule 116.3(A).
3. Please provide all notes, handwritten or otherwise, that relate to the circumstances surrounding any questioning of the defendant.



LESSER NEWMAN SOUWEINE & NASSER, LLP

Letter to William M. Welch II, Esq.
June 6, 2005
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4. If the government intends to introduce co-conspirator hearsay statements, please provide notice of such statements and the basis for their introduction.
5. Please provide the reports of all tests and examinations conducted upon any evidence in this case, including but not limited to any fingerprint analysis, that: (a) is within the possession, custody, or control of the government, or (b) the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.
6. Please disclose copies of any written or recorded statements made by the defendant; the substance of any oral statements made by the defendant; the substance of any response made by the defendant to interrogation; and any written summaries contained in the handwritten notes of any Government agent of the defendant's oral statements and/or any response to any Miranda warnings that may have been given to the defendant.
7. Please provide the identification and location of any informants or cooperating witnesses, as well as the identity and location of any other percipient witnesses not yet made known to the defendant.
8. Please provide the name of any witness who has made any arguably favorable statement(s) concerning the defendant with regard to the actions and/or inactions that are the subject of the indictment.
9. Please provide a copy of any arguably favorable statement(s) concerning the actions and/or inactions of the defendant that are the subject of this indictment and, if such statements have not been reduced to writing, the substance of such statements.
10. Please provide any statement that may be "relevant to any possible defense or contention" that the defendant may assert. This includes but is not limited to any statements by any percipient witnesses.
11. Please provide copies of any documents relevant to Count 85 of the indictment.

LESSER NEWMAN SOUWEINE & NASSER, LLP

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Pursuant to Local Rule 116.3(A), please reply in writing to the above-listed requests no later than fourteen days from now, that is, no later than June 20, 2005.

The defendant Maria Serrazina reserves the right to supplement these requests.

Very truly yours,

A handwritten signature in black ink, appearing to be 'TL' with a stylized flourish.

Thomas Lesser

TL/kt

Serrazina\Ltr. Welch re Discovery
6/6/05